

STATE OF SOUTH CAROLINA**(Caption of Case)**

Application of Duke Energy Carolinas, LLC for
Approval of Rider 9, Demand-Side Management and
Energy Efficiency for 2018

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA****COVER SHEET****DOCKET****NUMBER:** 2017 - 65 - E

(Please type or print)

Submitted by: Stephanie U. Eaton**SC Bar Number:** 80073**Address:** 110 Oakwood Drive, Suite 500**Telephone:** 336.631.1062Winston-Salem, NC 27103**Fax:** 336.725.4476**Other:** _____**Email:** seaton@spilmanlaw.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)☐ **Emergency Relief demanded in petition**☐ **Request for item to be placed on Commission's Agenda expeditiously**☐ **Other:** _____

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)			
<input checked="" type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input checked="" type="checkbox"/> Letter	<input type="checkbox"/> Request	
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification	
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation	
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement	
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment	
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter	
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response	
<input type="checkbox"/> Railroad	<input checked="" type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery	
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition	
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation	
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena	
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff	
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other: _____	
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest		
<input type="checkbox"/> Other: _____	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit		
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report		

Print Form

Reset Form



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May 15, 2017

Via SCPSC E-FILING DMS

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, SC 29210

**Re: Application of Duke Energy Carolinas, LLC for Approval of Rider 9,
Demand-Side Management and Energy Efficiency for 2018
Docket No. 2017-65-E: Comments**

Dear Ms. Boyd:

Wal-Mart Stores East, LP and Sam's East, Inc. (collectively, "Walmart"), timely filed a Petition to Intervene in this case on April 7, 2017, which was granted by South Carolina Public Service Commission ("Commission") Directive Order issued on April 19, 2017. By way of this letter, Walmart provides limited Comments (due on this date per the Commission Directive issued September 17, 2014, Docket No. 2013-92-A, Order No. 2014-766).

Walmart has reviewed Duke Energy Carolinas, LLC's ("DEC" or "Company") filing and supporting documentation, and has no objection to DEC's proposed changes. Walmart also notes that DEC proposes to maintain, without change, the opt-out provisions of Rider EE. Walmart strongly supports the opt-out concept in light of Walmart's extensive, self-funded energy efficiency ("EE")/demand-side management ("DSM") efforts; however, as Walmart explained in its Petition to Intervene in this matter, it believes that consideration should be given to modify DEC's "opt-out" procedures (Rider EE(SC), page 3 of 4) so that they are consistent with the opt-out procedures embodied in the Duke Energy Progress ("DEP") tariff in South Carolina (Rider DSM/EE-8, Sheet 1 of 2), which Walmart believes are more efficient. In that regard, Walmart has raised this issue with DEC, and Walmart affirms its willingness and desire to work cooperatively with DEC and the Office of Regulatory Staff to evaluate harmonizing the DEC and DEP opt-out processes in the future.

The Honorable Jocelyn G. Boyd


May 15, 2017

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By copy of this letter, I am serving all parties of record via Electronic Mail and/or First-Class Mail. Please contact us if you have any questions concerning this filing.

Sincerely,

SPILMAN THOMAS & BATTLE, PLLC

By 
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(SC Bar No. 80073)

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SUE/sds

Attachments

c: Certificate of Service

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2017-65-E

In the Matter of:

Application of Duke Energy Carolinas, LLC
for Approval of Rider 9, Demand-Side
Management and Energy Efficiency for 2018

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served one (1) copy of the foregoing document upon the following parties to this proceeding via Electronic Mail and/or First-Class Mail:

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Dated: May 15, 2017